



Date: September 15, 2025

To: Commanding General, Marine Corps Air Ground Combat Center (MCAGCC),
Twentynine Palms

Draft EA Review Team, Federal Aviation Administration (FAA)

Naval Facilities Engineering Systems Command Southwest
Attention: Mr. Ryan Maynard, PSUA EA Project Manager
750 Pacific Highway, Floor 12
San Diego, CA 92132-0058

Via submission by email, and on the US Marine Corp project website:

<https://www.29palmspsua.com/Comments.aspx>

Re: Draft Environmental Assessment (EA): Establishment and Modification of Permanent
Special Use Airspace (R-2509) over and adjacent to MCAGCC / Johnson Valley Shared
Use Area (Draft PSUA EA, Aug. 2025)

Dear Commanding General, Draft EA Review Team, Mr. Maynard, & PSUA Planning Team:

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the Draft Environmental Assessment (EA) for the proposed establishment of permanent Special Use Airspace (SUA) over the Johnson Valley Shared Use Area. UPLA is a non-profit organization representing over 5,800 members, in addition to speaking out for 69 OHV clubs and organizations. We advocate for responsible outdoor recreation, active stewardship of public lands, and encourage members to exercise a strong conservation ethic including “leave no trace” principles. We champion scrupulous use of public lands for the benefit of the general public and all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with public land managers, all recreationists, and other public land stakeholders. Our members participate in outdoor recreation of all forms to enjoy federally and state managed lands throughout Utah and the Western USA, including at Johnson Valley. UPLA members and supporters have concrete, definite, and immediate plans to continue recreating at Johnson Valley at the present time and throughout the future.

I, Rose Winn, am an avid outdoor recreation enthusiast and anthropologist; hiking, backpacking, backcountry horseback riding, camping, rock climbing, off-roading, fishing, forage of wild herbs



and plants for medicinal uses, and exploration of cultural and archeological sites and artifacts on public lands are among my core areas of activity and interest. I serve as the Natural Resources Consultant for Utah Public Lands Alliance (UPLA), a non-profit organization dedicated to keeping offroad trails open for all recreation users. While my profession allows me to advocate to protect public access to public lands for all stakeholders and multiple-uses, I also work as a volunteer on conservation, mitigation, and restoration projects on public lands.

As a joint writer of this comment letter, Loren Campbell is a Jeeper and UTV enthusiast from Virgin, Utah. Loren serves as the President of Utah Public Lands Alliance (UPLA). We share a strong interest in maximizing opportunities for offroad motorized recreation. Loren works full time as a volunteer advocate to protect access for all users, and also organizes and works as a volunteer on projects on public lands. UPLA, Loren, and myself are also members of BlueRibbon Coalition. These comments are submitted on behalf of both myself and Loren Campbell, as well as our members and followers from within and outside of Utah.

Please note our support and agreement with the comments submitted by BlueRibbon Coalition.

As noted, UPLA is a Utah-based nonprofit dedicated to preserving public lands access for responsible multiple-use, including off-highway vehicle (OHV) recreation. While our organizational mission is focused on Utah, Johnson Valley is a nationally renowned OHV destination, and Utah riders are among those who regularly travel to the California desert to participate in large-scale events, recreational riding, and family outings. The OHV community is interconnected, and the fate of Johnson Valley reverberates across state lines.

We therefore urge you to recognize that the Draft EA is inadequate and must not be finalized as written. The proposed “surface-to-sky” SUA is in direct conflict with the congressional balance codified in Public Law 113-66 (FY2014 NDAA), which designated Johnson Valley as a Shared Use Area. UPLA calls for:

- (1) Preparation of a full Environmental Impact Statement (EIS) to replace the deficient Environmental Assessment (EA);
- (2) Extension of the public comment period to at least 90 days;
- (3) Modification of alternatives to include a 1,500-foot above ground level (AGL) airspace floor and binding exemptions for emergency, event, and utility flights; and
- (4) Establishment of a formal liaison between USMC, FAA, and OHV recreation groups to guarantee transparency and shared governance.



The Significance of Johnson Valley for Utah Recreationists

Though Johnson Valley is located in California, it is a vital part of the western OHV network. Utah recreationists are frequent participants in the world-famous King of the Hammers (KOH) event, which attracts thousands from across the U.S. and internationally. Utah riders, teams, media crews, and spectators contribute not only to the event's scale and prestige but also to the \$34 million annual economic impact that flows into San Bernardino County. The loss or diminishment of KOH, due to restrictions on helicopters, drones, and chase operations, would harm not just Californians but also the broader OHV community, including those of us in Utah who travel hundreds of miles to take part.

Johnson Valley also functions as a proving ground for off-road equipment, clubs, and enthusiasts whose experiences shape OHV recreation nationwide. The Shared Use Area is more than a California asset – it is a cornerstone of OHV culture and access for western recreationists.

Statutory Conflict: Congressional Protections and Shared Use

The 2013–2014 congressional settlement establishing the Johnson Valley Shared Use Area (P.L. 113-66) explicitly set forth a cooperative balance:

- Roughly 188,000 acres of Johnson Valley were designated for OHV recreation, managed by BLM, and protected for public use when not under active military training.
- Military use was limited to two 30-day training periods per year (total of 60 days).
- A Resource Management Group was created to facilitate coordination between the Navy, Interior, and public stakeholders.
- Congress preserved utility corridors, safety, and existing public uses.

The proposed SUA would effectively override this compromise by granting permanent, surface-to-sky control of the airspace to the Marine Corps. Such control threatens to undermine civilian aviation supporting OHV recreation, utilities, and emergency response, even if ground access technically remains. This represents both an explicit violation of statutory intent and an implicit erosion of the balance Congress required.

Specific Impacts Ignored in the Draft EA

1. Emergency Medevac Flights

Johnson Valley's remote terrain leads to frequent OHV accidents. Medevac helicopters are often the only viable way to transport injured recreationists to trauma centers in time.



A SUA regime that requires clearance delays or pre-approval will cost lives. The Draft EA does not adequately address this risk, nor does it model potential delays or mortality outcomes. Binding exemptions for medevac flights, or a guaranteed 1,500' AGL floor, must be included.

2. King of the Hammers (KOH)

KOH depends on helicopter and drone operations for safety monitoring, live coverage, and chase support. Without these aviation functions, the event cannot operate safely or at the same scale. The Draft EA fails to account for the \$34 million annual economic benefit KOH delivers to San Bernardino County, a significant portion of which comes from out-of-state recreationists, including Utah.

3. Utility and Safety Operations

Powerline inspection flights, corridor monitoring, and utility maintenance rely on Johnson Valley's open airspace. P.L. 113-66 preserved these uses, yet the Draft EA fails to provide enforceable assurances that they can continue unhindered. Limiting or delaying such flights risks public safety and infrastructure reliability.

4. Cumulative & Precedential Effects

The Draft EA underestimates the cumulative impacts of establishing permanent SUA over public recreation lands. History at other installations shows that once airspace is restricted, "operational creep" occurs, steadily reducing civilian use even if ground access is nominally preserved. This precedent could threaten other shared-use or multiple-use agreements nationwide, including in Utah.

NEPA Deficiencies — Why an EIS is Required

By law, an Environmental Impact Statement is required when a proposed action may significantly affect the human environment. The Draft EA fails this test by:

- Ignoring quantitative modeling of medevac response times.
- Omitting robust economic analysis of KOH and tourism impacts.
- Neglecting cumulative and long-term effects of restricted airspace.
- Failing to reconcile statutory conflicts with P.L. 113-66.

An EA is inadequate; only a full EIS with public scoping and interagency review can satisfy NEPA requirements.



Additionally, limiting public comments to 3,000 characters obfuscates the public's ability to provide meaningful, detailed, and fully relevant feedback on the Draft EA. Furthermore, some of our members and those among the general public who would like to submit public comments are limited in their access to technical resources to effectively access and navigate the PSUA Draft EA website. We urge the PSUA Planning Team to utilize an online platform that does not limit the length of public comments by character, word count, or any other measure, and, provide an email address as an alternative mode of public comment submission.

Recommended Remedy for the Issues Cited Above

1. **Prepare a full Environmental Impact Statement (EIS).**
2. **Extend the public comment period to 90 days** to allow meaningful stakeholder review.
3. **Adopt a 1,500-foot AGL airspace floor** and codify permanent exemptions for medevac, event, and utility flights.
4. **Activate the Resource Management Group** and establish a permanent liaison role between USMC, FAA, and OHV groups to ensure transparent, ongoing coordination.
5. **Conduct a socio-economic analysis** quantifying impacts on KOH and related businesses, incorporating contributions from out-of-state visitors, including Utah residents.
6. **Provide operational transparency** by publishing training schedules, clearance timelines, and mitigation protocols to avoid unnecessary disruptions.
7. **Eliminate barriers to public comment submissions** by removing the 3,000 word-count limit for public comments, and providing a dedicated email address as an alternative mode of comment submission.

In closing, we would like to emphasize that Johnson Valley is not just a California recreation site; it is a national OHV destination whose importance extends deeply into Utah and across the western United States. Utah recreationists contribute both to the recreational culture and to the economic vitality of San Bernardino County through their participation in Johnson Valley events. The Draft EA's failure to adequately address emergency safety, event viability, infrastructure reliability, statutory conflicts, and cumulative impacts is unacceptable.

UPLA urges the Marine Corps and FAA to fulfill both the spirit and the letter of congressional intent for Johnson Valley by: conducting a full EIS, extending public engagement, preserving a 1,500' airspace floor, guaranteeing essential exemptions, and formalizing interagency and stakeholder liaison processes. Only then can the Shared Use Area truly function as Congress intended — balancing national defense with the public's right to access and enjoy Johnson Valley.



Please acknowledge receipt of this comment and provide UPLA with:

- (a) the timeline for next steps in NEPA,
- (b) dates for any planned RMG meetings and EIS scoping, and
- (c) contact information for the designated liaison so our members and technical experts may engage meaningfully.

We are available to provide technical, economic, and recreational user testimony to help the agencies identify solutions that preserve both military training readiness and the public safety, economic, and recreational uses that Congress intended Johnson Valley to protect. UPLA would like to be considered an interested public for the proposed permanent SUA. Information can be sent to the following address and email address:

Rose Winn & Loren Campbell
Utah Public Lands Alliance
PO Box 833, St. George, UT 84771
rose@utahpla.com

Sincerely,

Rose Winn
Natural Resources Consultant
Utah Public Lands Alliance

Loren Campbell
President
Utah Public Lands Association

cc: Congressman Jay Obernolte, San Bernadino County Supervisor Dawn Rowe, BlueRibbon Coalition

References and relevant sources cited above:

- Draft PSUA Public Draft Environmental Assessment (Aug. 2025). ([29 Palms Marine Base](#))
- MCAGCC public announcement and Draft EA posting. ([29 Palms Marine Base](#))
- Johnson Valley/Johnson Valley Off-Highway Vehicle Recreation Area statutory provisions (P.L. 113-66; National Defense Authorization Act for FY2014) (Sections 2941–2946 — Shared Use Area, Resource Management Group, public recreational use). ([Congress.gov](#))



- San Bernardino County: King of the Hammers economic impact (2023) — \$34.1M total economic impact. (sanbern-prod.s3.amazonaws.com)
- CEQ/NEPA implementing regulations and guidance on when an EIS is required (40 C.F.R. Parts 1500–1508). ([The Department of Energy's Energy.gov](https://www.energy.gov))
- FAA minimum safe altitudes (14 C.F.R. § 91.119) and FAA low-flying guidance. ([Legal Information Institute](https://www.legalinformationinstitute.com))
- Marine Corps / public comments portal (Draft EA comment form and current deadline information). (29palmspsua.com)